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**Hearing Date: TBD**  
**Hearing Time: TBD**  
**Objection Date: TBD**

And

Shawn M. Christianson, Esq.  
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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re:

**CELSUIS NETWORK, LLC, et al.,**  
Debtors.

**Chapter 11**

**Case No. 22-10964 (MG)**  
**(Jointly Administered)**

In re:

**CELSUIS MINING LLC**  
Debtor

**Case No. 22-10968 (MG)**

**ORACLE AMERICA INC.'S REQUEST FOR ALLOWANCE AND  
PAYMENT OF CHAPTER 11 ADMINISTRATIVE EXPENSES**

Oracle America, Inc., successor in interest to NetSuite, Inc. ("Oracle"), a creditor and contract counter-party in the above-captioned Chapter 11 case, hereby requests allowance and payment of an administrative expense in the amount of \$12,461.39, pursuant to sections 503(a) and (b) of the Bankruptcy Code (the "Administrative Request"), for post-petition goods and products provided, and services rendered, by Oracle to Celsius Mining LLC ("Debtor").

1. Oracle is a licensor of computer software and, pursuant to agreements, provides software-related products, technical support, maintenance, educational materials, and programs,

as well as cloud-based and point of sale services, which Oracle often customizes for the customer's specific needs. Prior to July 13, 2022 (the "Petition Date"), the Debtor and Oracle were parties to several such license agreements (the "Oracle Agreements").

2. On November 9, 2023, the Court entered an Order [Dkt. No. 3972] confirming the *Modified Chapter 11 Plan of Reorganization of Celsius Network LLC and Its Debtor Affiliates* [Dkt. No. 3577] ("Plan"). The Plan became effective on January 31, 2024 ("Effective Date"). Pursuant to the Plan, the Oracle Agreements were rejected as of the Effective Date.

3. Oracle submits this Administrative Request pursuant to the *Notice of Occurrence of Effective Date of Debtors' Modified Chapter 11 Plan of Reorganization and Commencement of Distribution* ("Notice"). Pursuant to the Notice, the last day to file an administrative claim is March 1, 2024.

4. Debtor owes Oracle \$12,461.39 for support services which Oracle provided to the Debtor after the Petition Date and prior to the Effective Date. These post-petition services are evidenced by the outstanding invoice ("Invoice") attached hereto as **Exhibit A**.

5. Oracle asserts that the Debtor used Oracle's services up until the Effective Date and therefore provided ongoing tangible value to the Debtor's estate.

6. Oracle also filed a rejection damages claim for all amounts due under the Invoice. Oracle is not seeking a duplicative recovery. Oracle believes that the services reflected by the Invoice and this Administrative Request are entitled to administrative expense allowance.

7. However, to the extent not allowed as an administrative expense, Oracle seeks to ensure such sums are allowed pursuant to its filed rejection damages claim.

**WHEREFORE**, Oracle respectfully requests allowance and payment of an administrative expense to Oracle in an amount of not less than \$12,461.39, and reserves its right to supplement this Administrative Request if additional unpaid administrative amounts accrue.

Dated: March 1, 2024  
Lake Success, New York

Respectfully submitted,

By: /s/ Amish R. Doshi  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2024, I served a copy of *Oracle America, Inc.'s Request For Allowance And Payment Of Chapter 11 Administrative Expenses* on the parties listed on the attached service list by attaching a pdf file of the documents to the email listed next to their names. In addition, the parties entitled to receive notice by the Court's CM-ECF system were sent an email notification of such filing by the Court's CM-ECF System.

/s/ Amish R. Doshi

**SERVICE LIST**

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